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4 **DANI L. STEPHENS, ESQ.**  
5 Nevada State Bar #4761  
6 5000 W. Oakey Blvd. A3-6  
7 Las Vegas, Nv. 89146  
8 (702) 247-1234  
9 Attorney for Debtor  
10 SHIRLEY MAE ROBINSON  
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15 **UNITED STATE BANKRUPTCY COURT**  
16 **DISTRICT OF NEVADA**

17 In the Matter of: ] BK-S-05-12090LBR  
18 ] Chapter 13  
19 SHIRLEY MAE ROBINSON ]  
20 Debtor. ] Hearing Date: 7-24-2009  
21 ] Hearing Time: 1:30PM  
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29 **DEBTOR'S MOTION TO SET ASIDE ORDER PERMITTING RELIEF OF STAY**

30 COMES NOW, Debtor, SHIRLEY MAE ROBINSON, by and through her  
31 attorney, **DANI L. STEPHENS, ESQ.**, to move this Honorable Court to  
32 set aside the order permitting Wells Fargo a relief from Automatic  
33 Stay on the following grounds:

34 1. Debtor alleges that the bank is mistaken in adding up her  
35 payments. She has proof that she is only one payment in arrears.

36 2. Debtor had tried assiduously to get a reverse mortgage in  
37 place and everything was ready to go when it was discovered another  
38 attorney, Christopher Byrd, had filed a foreign lien on behalf of a  
39 California firm, for \$35,000 against her home for a debt owed by a  
40 totally different Shirley Robinson and her husband. Efforts to have  
41 this lien removed short of court action have been in vain, - in spite  
42 of proof being provided.

1           3. Debtor respectfully prays this court to vacate the Order  
2 issued on July 24th and allow her the opportunity to prove the  
3 motion for relief from stay was untimely.

4           WHEREFORE based on the foregoing, Debtor prays that this  
5 Honorable Court set aside Creditor's motion to dismiss and grant her  
6 an extension if needed. She also asks for a full accounting of her  
7 payments as she believes the Mortgage holder Wells Fargo bank has  
8 added them up wrongly.

9           DATED, this 31st day of July, 2009.

10                               Respectfully submitted by:

11                               /s/ DANI L. STEPHENS, ESQ.  
12                               **DANI L. STEPHENS, ESQ.**  
13                               Nevada State Bar #4761  
14                               5000 West Oakey Blvd. Ste A3-6  
15                               Las Vegas, Nv. 89146  
16                               Attorney for Debtor  
17                               SHIRELY MAE ROBINSON  
18                               BK-S-05-12090LBR  
19                               Chapter 13  
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